

**To:** Dermer, Michele[Dermer.Michele@epa.gov]; Gambatese, Jason[Gambatese.Jason@epa.gov]  
**Cc:** Coffman, Joel[Coffman.Joel@epa.gov]; Rumrill, Nancy[Rumrill.Nancy@epa.gov]; Albright, David[Albright.David@epa.gov]; Robin, George[Robin.George@epa.gov]  
**From:** Robin, George  
**Sent:** Thur 1/22/2015 6:52:33 PM  
**Subject:** RE: UIC/Aquifer Exemption permitting question

Thanks Michele, assuming you worked on this and know about developments. Please see that David on extremely short notice responded.

But please when time is available, let us know where the link can be found since it is good that we can do the same on future short notice.

George

**From:** Dermer, Michele  
**Sent:** Thursday, January 22, 2015 10:48 AM  
**To:** Robin, George; Gambatese, Jason  
**Cc:** Coffman, Joel; Rumrill, Nancy; Albright, David  
**Subject:** Re: UIC/Aquifer Exemption permitting question

The latest AE guidance is Peter Gravatt's memo. I will find a link and send to you. I am assuming we are assuming these guys are talking about a Class II situation. If its Class I then the application comes to us, but that is worth clarifying.

---

**From:** Robin, George  
**Sent:** Thursday, January 22, 2015 10:41 AM  
**To:** Gambatese, Jason; Dermer, Michele  
**Cc:** Coffman, Joel; Rumrill, Nancy; Robin, George; Albright, David  
**Subject:** RE: UIC/Aquifer Exemption permitting question

Thanks Jason,

I plan on calling Chevron in response. I will describe what I typed below, assuming that everyone is ok with that synopsis, along with the message to work with the Ca's DOGGR.

However, I do anticipate that they will find out that what they want will be the latest version of the EPA guideline type document (actually for agencies to use and guide operators) on preparing, etc. an Aquifer Exemption.

Michele, could you please forward the latest – or the website where it is located? I think it is publically available – no longer deliberative?

George

**From:** Gambatese, Jason  
**Sent:** Wednesday, January 21, 2015 3:29 PM  
**To:** Robin, George; Dermer, Michele  
**Cc:** Coffman, Joel; Rumrill, Nancy  
**Subject:** RE: UIC/Aquifer Exemption permitting question

Can someone please sum all this up and reply to the original emailer so I don't mess up the response and in case he has any follow-up questions?

Thanks so much

Jason Gambatese

EPA Region 9

Drinking Water Protection Section (WTR 3-2)

75 Hawthorne Street

San Francisco, CA 94105

phone: 415-972-3571

fax: 415-947-3545

email: [gambatese.jason@epa.gov](mailto:gambatese.jason@epa.gov)

**\*for drinking water quality compliance data submittals, please send them to [datamanager@epa.gov](mailto:datamanager@epa.gov) and copy your program manager\***

**From:** Robin, George  
**Sent:** Wednesday, January 21, 2015 11:07 AM  
**To:** Dermer, Michele; Gambatese, Jason  
**Cc:** Coffman, Joel; Rumrill, Nancy; Robin, George  
**Subject:** RE: UIC/Aquifer Exemption permitting question

Technically, for a primacy state such as the Ca. DOGGR, an AE (Aquifer Exemption) is a revision of their UIC program. The state processes, reviews, seeks public and sister agency Comments, and prepares the documentation, justification, assurance that the aquifer in question qualifies for exemption (meaning “exemption from protection,” because it is “not an USDW” per regulatory guidelines and directives, especially see 40 CFR Part 146.4. The state then formally presents this compilation to the EPA who has the authority to make that decision or denial. The formal submission begins a 45-day clock within which the EPA must respond or default a decision to grant the request. See 40 CFR Part 144.7.

**Note**, per Chris Flail’s request that this formal action is “when the application is received.” However, informally, the state customarily receives the application from the operator and notifies the EPA, whereupon a quick review/discussion is useful to identify any “show stoppers” or obvious impediments to the exemption, and including any advice that will make the process move efficiently.

George

George Robin ([robin.george@epa.gov](mailto:robin.george@epa.gov))

*Engineer, Underground Injection Control*

*US EPA, Region IX                      Phone (415) 972-3532*

*75 Hawthorne St.                      Fax (415) 947-3549*

*Ground Water Office*

*Mail Code: WTR-3-2 (new)*

*San Francisco, CA 94105*

**From:** Dermer, Michele  
**Sent:** Wednesday, January 21, 2015 10:45 AM  
**To:** Gambatese, Jason  
**Cc:** Coffman, Joel; Robin, George; Rumrill, Nancy  
**Subject:** RE: UIC/Aquifer Exemption permitting question

I am not aware of any statutory requirements that govern the review of AE applications, but I have neither received nor processed any. Perhaps George is aware of this? Joel has described the UIC application process and notification of administrative completeness is done in writing.

**From:** Coffman, Joel  
**Sent:** Wednesday, January 21, 2015 9:10 AM  
**To:** Gambatese, Jason; Robin, George; Rumrill, Nancy; Dermer, Michele  
**Subject:** RE: UIC/Aquifer Exemption permitting question

Once a UIC permit application is received, there is an initial 30 day administrative review performed, followed up with a letter letting the applicant know what is lacking (if anything) and informing them the administrative is either complete, or, pending submittal of missing items, will be completed then. After completion of the administrative review process, technical review begins and the applicant is kept in the loop as that review progresses. Others on this string may have additional comments. The aquifer exemption process operates a bit differently – Michele is probably the best person to provide that answer. Joel

**From:** Gambatese, Jason  
**Sent:** Wednesday, January 21, 2015 8:56 AM  
**To:** Robin, George; Rumrill, Nancy; Coffman, Joel; Dermer, Michele  
**Subject:** FW: UIC/Aquifer Exemption permitting question

Can one of you answer this question?

Thanks

Jason Gambatese

EPA Region 9

Drinking Water Protection Section (WTR 3-2)

75 Hawthorne Street

San Francisco, CA 94105

phone: 415-972-3571

fax: 415-947-3545

email: [gambatese.jason@epa.gov](mailto:gambatese.jason@epa.gov)

**\*for drinking water quality compliance data submittals, please send them to [datamanager@epa.gov](mailto:datamanager@epa.gov) and copy your program manager\***

**From:** Flail, Chris [<mailto:Chris.Flail@chevron.com>]  
**Sent:** Wednesday, January 21, 2015 8:54 AM  
**To:** Gambatese, Jason  
**Subject:** FW: UIC/Aquifer Exemption permitting question

Good Morning Jason

I just have a brief permitting questions that I hope you can help me with. Regarding UIC permits and/or Aquifer Exemption applications, does the EPA notify an applicant once an application is received and the EPA determines the application sufficiently complete for reviewing purposes? If so, can you tell me how the applicant is notified? (mail, email, phone)

Thank you for your time and assistance.

**Chris Flail**

**Land Representative**

**San Joaquin Valley Business Unit**

**Chevron North America Exploration & Production Co.**

**Office: (661) 654-7403**